

SECTION	TEXT	COMMENT	POST?
GENERAL COMMENTS	N/A	We urge the DOE, NNSA and LANL to establish a community calendar so that the various LANL organizations who are scheduling public meetings are aware of other community events, such as the public comment periods on various documents, including PMRs, semi-annual meetings (e.g., CMRR and storm water permit meetings), Northern New Mexico Citizens' Advisory Board meetings, RACER, New Mexico Community Foundation FEED meetings, tours, etc. Such a community calendar would be an efficient and effective way to reduce the back and forth about the need for extensions of time and requests to reschedule meetings. It would be helpful if that information were posted on the CRP webpage.	Yes
1.0 INTRODUCTION	<p>The mission of the Los Alamos National Laboratory (LANL) is to develop and apply science and technology to Ensure the safety, security, and reliability of the U.S. nuclear deterrent; Reduce global threats; and Solve other emerging national security challenges.</p> <p>To accomplish our mission, the Laboratory generates some hazardous and mixed waste. Hazardous waste management activities are regulated by the New Mexico Environment Department (NMED) pursuant to New Mexico Hazardous Waste Act [HWA; Chapter 74, Article 4 NMSA 1978] and regulations promulgated under the Act. In 1989, NMED issued the Los Alamos National Laboratory (LANL) Hazardous Waste Facility Permit (EPA ID Number NM0890010515-1) that established standards for how LANL manages, stores and treats hazardous wastes on-site and for the closure and post-closure care of permitted waste management units.</p> <p>On December 28, 2010, NMED renewed LANL Hazardous Waste Facility Permit (the Permit). More information can be found on the NMED Hazardous Waste Bureau LANL Permit page: http://www.nmenv.state.nm.us/hwb/lanlperm.html#FinalPermit</p> <p>Los Alamos National Laboratory is owned by the Department of Energy (DOE) and operated under contract by Los Alamos National Security, LLC. The Department of Energy and Los Alamos National Security, LLC, are co-permittees on the LANL Hazardous Facility Waste Permit.</p> <p>Public involvement in the activities of the Permit is the subject of the Community Relations Plan (CRP).</p>	It seems that all of the cited Plan elements have been ongoing for many years. Thus, the Plan is a collection of previously existing programs; no programs were created specifically to comply with the mandates of the Permit	Yes
		<p>Section 1.0. It is important for the CRP to state that the permit allows LANL to generate, manage, treat and store over a quarter million pounds of hazardous waste annually. The word "some" hazardous and mixed waste used in both this section and in the "We Need Your Input" one-pager does not adequately portray the magnitude of what is covered by the permit.</p> <p>Please use another word for "promulgated," such as "created."</p> <p>This section should state that it is a ten-year permit, set to expire in November 2020. It should include a brief description about the number and type (container storage, treatment units, open burning units, etc.) of permitted waste management units included under the permit.</p>	Yes
2.0 PURPOSE OF THE COMMUNITY RELATIONS PLAN	<p>Section 1.12 of the Hazardous Waste Facility Permit requires that LANL establish and implement a Community Relations Plan (CRP). The purpose of the CRP is to keep surrounding communities and interested members of the public informed about permit-related activities and provide mechanisms to gather comments and suggestions. Permit-related activities include but are not limited to waste management, closure and post closure activities and corrective actions.</p> <p>LANL works to increase public knowledge of environmental science, remediation methodology and stewardship practices, to inform the public of the status of the regulatory compliance and to use stakeholder input to inform environmental stewardship decisions.</p> <p>We are soliciting comments from communities, organizations and interested members of the public as we write our Community Relations Plan.</p>	Section 2.0. There should be a brief description of waste management, closure, post closure care, and corrective action. The CRP should also define "stewardship practices." Please define how stewardship practices differ from "post-closure care."	Yes

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3.0 WHOM WILL WE CONSULT?	Toward this objective, LANL interacts with diverse sectors of the public: the tribal and pueblo governments contiguous with the Laboratory and their members, nearby citizen and civic groups, federal, state and local elected officials of the surrounding communities, our workers and their families and the interested public.	Section 3.0. To which “objective” is the first sentence referring? Please include “community,” with the listing of citizen and civic groups.	Yes
4.0 ELEMENTS OF THE PLAN	<p>Consistent with the terms of the Permit, the Community Relations Plan will provide for six elements of community relations. The plan, which will be issued before June 28, 2011, will describe how LANL will</p> <ol style="list-style-type: none"> 1. establish an open working relationship with communities and interested members of the public; 2. establish a productive government to government relationship with local tribes and pueblos (note: though the Plan will describe establishing relationships with local tribes, government to government relationships are conducted only by the Department of Energy); 3. keep communities and interested members of the public informed of permit actions of interest; 4. minimize disputes and resolve differences with communities and interested members of the public; 5. provide a mechanism for the timely dissemination of information in response to individual requests; and 6. provide a mechanism for communities and interested members of the public to provide feedback and input to the Permittees. <p>Below are our preliminary plans to provide for these aspects, pending public input.</p>		
5.0 DRAFT COMMUNITY RELATIONS PLAN	The following elements constitute the LANL Community Relations Plan. Each section responds to one of the six elements required in the Permit as listed in Section 4.0. The draft Community Relations Plan is written to be comprehensive but will also be a living document, informed by our public and updated annually to include the input that we receive.	All of the mechanisms and entities mentioned here by LANL have been in existence for many years and cannot be considered a part of a new community relations plan.	Yes
		Section 5.0. The permit requires the CRP to be updated annually. We suggest that the Permittees hold a public meeting in July or August of each year in order to gather public input. Our request is based on the fact that the draft CRP does not comply with the permit as to specify how the Permittees will solicit the annual comments and how it will post the entirety of the comments on September 1 of each year.	Yes
5.1 Establish an open working relationship with communities and interested members of the public	Los Alamos National Laboratory environmental stewardship and hazardous waste management activities have become increasingly transparent and responsive to the public. Measured by our annual Community Leaders Survey, respondents reporting that they are satisfied that LANL is providing effective environmental stewardship, monitoring and remediation increased from 63% in 2008, to 70% in 2009 and to 73% in 2010. Through the Community Relations Plan, we will use community input to continue the trend.	The annual surveys of the attitudes of local community leaders toward LANL is insufficient to convincingly demonstrate approval, or disapproval, by the local community of LANL behavior. A better means of determining the opinions of local community members would be to survey these opinions directly. Moreover, the annual survey of local community leaders has been ongoing for several years and could hardly be counted as a part of a new plan to improve relations with the general public. The Plan makes no mention of the many other materials available through the existing LANL Community Programs Office	Yes

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		<p>Section 5.1. This section does not describe how LANL will “establish an open working relationship with communities and interested members of the public.” Relying upon a survey, which is asked of certain community leaders, does not adequately address this permit requirement about establishing working relationships with communities and the public. For example, one year Joni Arends was asked to participate in the Community Leaders Survey. After providing negative responses to many of the questions, she was not asked to participate in the survey again. Please list specific action items the Permittees will do to meet Section 1.12(1). We offer suggestions below:</p> <ul style="list-style-type: none"> a. provide written or electronic copies of draft permit applications prior to presubmittal Class 1, Class 2, and Class 3 permit modification requests meetings b. promptly provide documents that are requested by “interested members of the public” c. eliminate scheduling back to back public meetings and public comment periods d. provide direct links to documents in email notifications. For example, it is difficult to find the monthly groundwater reports submitted to NMED on the LANL website. A lot of time is wasted trying to locate the reports which are buried in the multitude of environmental webpages e. provide a toll-free telephone number to be used for permit related inquiries during normal business hours. See WIPP draft CRP, Section 5.1. 	Yes
5.1.1 Public Notification: Face to Face, On-line, Via Email and Through News Media	<p>The Permittees are soliciting feedback in several manners so that the public can access the draft Community Relations Plan and provide comment</p> <p>Letters to the Facility Mailing list</p> <p>Email notification to the over 7000 email subscribers who have requested information about LANL environmental activities.</p> <p>Notices published in four local newspapers</p> <p>A link from the LANL environmental web site whereby readers can provide feedback using a fillable form.</p> <p>Input is solicited at public meetings and from community groups.</p> <p>This solicitation for comments will be conducted annually to update and improve upon the CRP</p>	<p>Section 5.1.1. Is it several “matters” or “manners?”</p> <p>Please list the four local newspapers.</p> <p>Please provide the link to where one may sign up for “Email Notifications.” Also provide a link to the NMED website where one may sign up for the “Facility Mailing List.” See Section 5.3.2 for link.</p> <p>Please explain specifically how LANL will solicit comments annually. The permit requires the CRP to be updated annually. We suggest that the Permittees hold a public meeting in July or August of each year in order to gather public input. Our request is based on the fact that the draft CRP does not comply with the permit as to specify how the Permittees will solicit the annual comments and how it will post the entirety of the comments on September 1 of each year.</p>	Yes
5.1.2 LANL Environmental Web Site www.lanl.gov/environment	<p>Through the LANL Environmental web site, members of the public may read the draft Community Relations Plan at www.lanl.gov/environment/waste/docs/CRPform.pdf</p> <p>fill out and submit the related comment/suggestion form online or print it for mailing, sign an optional consent form that allows the Permittees to post their suggested plan improvements to the CRP web page and provide contact information to receive future information.</p> <p>The extensive website provides educational and informational content and supplies email and telephone contacts for answering questions and giving comments throughout the year.</p>	<p>The Plan makes no mention of the NEWNET air quality data available, online and in real time, to the general public.</p>	Yes
5.1.3 Public Meetings and Briefings	<p>To continually improve relationships and dialogue with the community, LANL hosts community meetings, formal public meetings for Class 2 and 3 permit modifications, and informal meetings with interested groups and citizens. LANL requests invitations from community groups to attend their meetings for the purpose of sharing information, discussing environmental actions, and encouraging public participation. LANL also participates in recurring public meetings held by the DOE, the New Mexico Community Foundation, local pueblos, the Northern New Mexico Citizens Advisory Board and the New Mexico Environment Department.</p>	<p>Section 5.1.3. Please explain the different classes of permit modification requests (e.g., 1, 1*, 2 and 3).</p>	Yes

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5.1.4 Tours	Tours help acquaint the public with specific compliance and corrective action sites particularly during investigation and cleanup activities. Written information supplements the discussions during the tours. Seeing for themselves, citizens are better able to provide informed suggestions for improvements to environmental practices.	The Plan makes no mention of the Bradbury Museum, an important part of LANL ongoing community relations. Perhaps this is because the Bradbury invites contributions from the general public, for which it provides exhibit space. Some of these contributions are very critical of LANL operations, past and present	Yes
		Section 5.1.4. Please explain how one requests a tour. Explain the criteria and process for deciding whether to provide tours. We urge the Permittees to provide tours for every PMR.	Yes
		In addition, NNM CAB tours must be considered public tours. The general public must be allowed to attend all LANL-sponsored NNM CAB tours, no exceptions.	

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5.1.5 Northern New Mexico Citizens Advisory Board (NNMCAB)	The NNMCAB is a DOE-chartered site-specific advisory board whose purpose is to provide independent advice and recommendations to DOE regarding the Laboratory's corrective action and waste management activities and associated environmental issues. It is composed of citizens representing the communities and pueblos of northern New Mexico. The NNMCAB holds monthly public meetings and has chartered a number of subcommittees to address waste management, environmental surveillance, monitoring and remediation. LANL provides information and tours to the NNMCAB and has staff participation in its board and committee meetings.	The Plan makes no mention of the New Mexico Community Foundation and its commitment to providing a regular forum for the exchange of information and opinions between LANL personnel and members of the general public. The NMCF has recently been funded by the DOE to accomplish this important task and it's hard to understand why LANL's Plan does not claim part ownership of this group. After all, LANL includes the NNMCAB in its Plan. Yet the NNMCAB is wholly a DOE creation.	Yes
5.2 ESTABLISH A PRODUCTIVE GOVERNMENT TO GOVERNMENT RELATIONSHIP WITH LOCAL TRIBES AND PUEBLOS	The pueblos of northern New Mexico have well established government-to-government relationships with Los Alamos National Laboratory as delineated in formal cooperative agreements and with the Department of Energy as dictated in the Accord agreements. DOE Policy 144.1, Department of Energy American Indian Tribal Government Interactions and Policy, communicates U.S. Department of Energy programmatic and field responsibilities in relationships with sovereign American Indian and Alaskan Native tribal governments. Provisions in the Community Relations Plan will be applied to augment these already robust agreements for the activities covered by the Permit including waste management, closure and post closure activities and corrective actions. Pursuant to this goal, LANL meets regularly with the environment departments of pueblos, and schedules periodic meetings with the governance of the pueblos and their citizenry to discuss specific topics.	Government to government relations with the tribes have long been promoted by the DOE and are also nothing new	Yes
		Section 5.2. Because the government-to-government relationship with LANL involves sovereign nations, we suggest creating a new section in the CRP explaining the responsibilities LANL has towards the tribes and pueblos. We suggest consulting with the tribes and pueblos first to see if they would approve such a change to the draft CRP. See Section 5.2 of the draft WIPP CRP.	Yes
5.3 KEEP COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC INFORMED OF PERMIT ACTIONS OF INTEREST	The major objective of information dissemination is to familiarize the public with environmental stewardship, waste management and remediation practices so the public may participate knowledgeably in providing suggested improvements.	Section 5.3. This section should provide specific information about the public meetings and briefings LANL will hold about permit activities. For example, when will meetings be held? What will trigger the need for a public meeting? What criteria must be met to hold a public meeting? How much public notice will be given before the meeting? We urge the Permittees to adopt a standard operating procedure of providing a two-week advance public notice	Yes
5.3.1 Public Meetings and Briefings	LANL hosts community meetings and visits community groups to provide briefings. Some groups include local and tribal governments, civic organizations, local and regional governments, schools and universities, and non-profit organizations. The primary goals of these meetings are informational briefings, individual engagement, dialogue and solicitation of feedback.		
5.3.2 Mailing and Email Lists	The public is notified of events through mailings from the NMED-maintained Facility Mailing List. The Facility Mailing List consists of individuals, organizations, and government and tribal officials in northern New Mexico who have requested to be place on the list or who have submitted comments on the LANL Hazardous Waste Facility Permit in the past. Additionally, the public may sign up to receive email the required notifications when new actions or documents are generated relating to the Permit. The link for signup can be found at www.lanl.gov/environment .		

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5.3.3 Public Notification	In addition to the provisions in 5.3.2, the public is also notified through public service announcements on local radio stations; notices and advertisements in local newspapers, such as Albuquerque Journal North, Santa Fe New Mexican, Rio Grande Sun, and Los Alamos Monitor; news releases and responses to queries from state, trade, and national media, and on LANL's web site at www.lanl.gov/environment .	Section 5.3.3. Please list the local radio stations, their call numbers, and links to their websites. Please specify the print days for the <i>Rio Grande Sun</i> and <i>Los Alamos Monitor</i> as they are not dailies	Yes
5.3.4 LANL Environmental Web Site www.lanl.gov/environment	To educate and inform the public, the LANL Environmental Web Site shares information organized by subject: air quality, biological resources, cleanup actions, compliance and monitoring, cultural resource management, risk reduction, waste management and water resources.		
5.3.5 Information Repository	<p>LANL maintains two information repositories for environmental documents. Reports published pursuant to the requirements of the Permit and other pertinent information are posted to the electronic Public Reading Room at epr.lanl.gov. A print Public Reading Room, currently located at the J. Robert Oppenheimer Study Center at corner of West Jemez and Casa Grande Roads, contains the subset of printed hard-copy documents specified by the Permit.</p> <p>In compliance with the requirements in Section 1.12 of the Permit, the following documents will be placed in both the electronic and the print Public Reading Rooms:</p> <p>Permit applications Permit modification requests and NMED responses Waste Minimization Report Biennial Report Corrective action documents Notices of deficiency or disapproval (NODs), NOD responses, final approval letters, and NMED directions associated with the documents Notices of violation (NOV), administrative compliance orders, responses required by the NMED, and NMED directions associated with the Permit.</p> <p>As new documents are issued, these will be placed in both Public Reading Rooms within 10 days of submitting the information to the New Mexico Environment Department.</p> <p>LANL will conduct training annually to teach the public how to access and search the documents in the Public Reading rooms.</p>	<p>The Plan makes no mention of the RACER electronic database. RACER is an online record of measurements made by LANL and NMED of the concentrations of a large number of contaminants of groundwater and soil all around the Pajarito Plateau over a period of many decades. RACER was created with DOE money, and the accumulation of its important environmental data is an ongoing process.</p> <p>A. Worse, the Plan's authors have made no attempt to accommodate the demands of local citizens, presented during the public RCRA Hazardous Waste Permit hearings: There is no mention of the extensive information on environmental contamination compiled by the LAHDRA project, which was funded by the DOE, and is available online in the LAHDRA final report.</p> <p>B. No attempt has been made to create a repository of historical records describing the involvement of DOE/LANL in the lives of local citizens and in the life of the surrounding communities. It was suggested that such a repository of historical records should be established at Northern New Mexico College</p>	Yes
		<p>Section 5.3.5. We disagree 100 percent with the location of the J. Robert Oppenheimer Study Center for the public reading room, or the physical information repository. Repeated testimony at the public hearing, along with written comments, provided strong community support for the physical information repository to be located at Northern New Mexico College.</p> <p>This matter needs to be resolved now. We understand that George Rael recently met with Northern New Mexico College about this matter, but we do not know the results of the meeting.</p>	Yes

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5.4 MINIMIZE DISPUTES AND RESOLVE DIFFERENCES WITH COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC	<p>LANL's principal strategy for minimizing disputes is to comply meticulously with applicable permits, regulations, laws, and milestone, then accurately document our compliance so that our regulator can approve LANL's hazardous waste management practices.</p> <p>Conflict grows in the medium of misunderstanding. Even with differences of perspective, addressing issues can be collaborative. Our proactive process can minimize, prevent and resolve conflict by first proactively providing information in an understandable manner to a broad spectrum of community members as specified in Sections 5.1, 5.2 and 5.3 above.</p>	It has long been DOE policy to employ professional facilitators to keep order at public meetings. Therefore, this element is also not new.	Yes
	<p>Secondly, it is LANL's practice to employ facilitators to conduct public meetings and to accept public comments and suggestions through the mechanisms described above.</p> <p>Finally, the Permittees will give careful consideration to public comments and suggestions, and work in consultation with communities and interested members of the public to avoid disputes and to resolve differences.</p> <p>The Permittees will address comments that allow for a response and provide the response to the community or individual with whom it originated. Questions, suggestions, inquiries and responses specific to the Community Relations Plan will be posted to the LANL Environmental web page, with the consent of the parties involved.</p>	<p>Further, Section 5.4 of the draft CRP states "LANL's principal strategy for minimizing disputes is to comply meticulously with applicable permits, regulations, laws, and milestones...." We do not have that experience in this case. "Conflict grows in the medium of misunderstanding. Even with differences of perspective, addressing issues can be collaborative. Our proactive process can minimize, prevent and resolve conflict by first proactively providing information in an understandable manner to a broad spectrum of community members as specified in Section 5.1, 5.2 and 5.3 above."</p> <p>In order to resolve this dispute, we request a meeting to discuss the physical information repository with DOE/NNSA/LANL and NMED prior to finalization of the CRP. We would request that representatives from Northern New Mexico College participate in the meeting as well.</p> <p>Please provide specific information about when and where the annual trainings will be conducted.</p>	Yes
5.5 PROVIDE A MECHANISM FOR THE TIMELY DISSEMINATION OF INFORMATION IN RESPONSE TO INDIVIDUAL REQUESTS	<p>LANL is committed to being responsive to reasonable public requests. Our policy is to provide any member of the public access to information required by the Permit. In order to speed the process of responding, we use the provisions described in Section 5.1: email, telephone and mail. We provide web links to information in the electronic Public Reading Room.</p>	Section 5.5. This section refers to Section 5.1.Both sections should provide links and email addresses in order to request information and documents. Please provide language about providing paper copies upon request	Yes
5.6 PROVIDE A MECHANISM FOR COMMUNITIES AND INTERESTED MEMBERS OF THE PUBLIC TO PROVIDE FEEDBACK AND INPUT TO THE PERMITTEES	<p>The Community Relations Plan provides the public with a variety of opportunities to get information personally, observe activities, discuss issues and provide feedback. As required by regulation, meetings are held for the purpose of obtaining public comments and recommendations on certain proposed actions that involve Class 2 and 3 modifications of the Laboratory's Hazardous Waste Facility Permit.</p> <p>LANL provides opportunities for public involvement at any time via our email address, envoutreach@lanl.gov as well as during Permit modification public meetings, tours and project-specific presentations. With permission, comments are posted to our web site and forwarded to the New Mexico Environment Department for consideration.</p>	Section 5.6. This section must provide a description of the pre-submittal permit modification request meetings. LANL must provide paper or electronic copies of the draft permit modification application to interested members of the public two weeks prior to the pre-submittal meeting. This is a system that has worked quite well for permit modification requests submitted to NMED by WIPP. The meetings have resulted in permit modification requests that may be processed more efficiently by NMED because many of the "bugs" have been worked out before submittal. See draft WIPP CRP, Section 5.1	Yes

